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3:99-CR-02143 USA V. SCHNEIDER

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JANICE M. DEATON 01 JAN 16 PK 4:18 Attorney at Law 2 #135188 2366 Front Street 3 San Diego, CA 92101 Telephone: (619) 231-1107 4 5 Attorney for Defendant NOREEN SCHNEIDER-RUCINSKI 6 7 UNITED STATES DISTRICT COURT 8 SOUTHERN DISTRICT OF CALIFORNIA 9 (HONORABLE MARILYN L. HUFF) 10 UNITED STATES OF AMERICA, CASE NO. 99cr2143 11 12 Plaintiff, NOTICE OF MOTION AND MOTION TO 13 WITHDRAW PLEA OF GUILTY VS. 14 NOREEN SCHNEIDER-RUCINSKI, DATE: January 29, 2001 TIME: 9:00 a.m. 15 Defendant. 16 TO: GREGORY A. VEGA, United States Attorney, and to THOMAS W. McNAMARA, Assistant 17 18 U.S. Attorney: 19 PLEASE TAKE NOTICE that on Monday, January 29, 2001, at 9:00 a.m., or as soon thereafter 20 as counsel may be heard, the defendant, Noreen Schneider-Rucinski, by and through her counsel, Janice Deaton, will move this Court to withdraw her guilty plea. 21 22 **MOTIONS** 23 The defendant, Noreen Schneider-Rucinski, by and through her counsel, Janice Deaton, and pursuant to Rules 11 and 32(e) of the Federal Rules of Criminal Procedure and the Fifth Amendment to 24 25 the United States Constitution, and all applicable local rules, hereby moves this Court to withdraw her guilty plea. 26 27 /// 28 ///

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This motion is based upon the attached memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other evidence brought before this Court before or during the evidentiary hearing on these motions.

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Dated: January 16, 2001

Respectfully submitted,

JANICE DEATON Attorney for Defendant

NOREÉN SCHNEIDER-RUCINSKI